

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JOANNE JAFFE,

v.

CITY OF NEW YORK, MAYOR BILL DE  
BLASIO, and POLICE COMMISSIONER  
JAMES O'NEILL

Docket No. 19-cv-07024 (LAP)

[PROPOSED] CIVIL CASE  
MANAGEMENT AND  
SCHEDULING ORDER

LORETTA A. PRESKA, United States District Judge:

This Civil Case Management Plan is submitted by Plaintiff in accordance with Fed.

R. Civ. P. 26(f)(3).

1. All parties **do not consent** to disposition of this case by a Magistrate Judge, pursuant to 28 U.S.C. § 636(c).
2. The parties expect that this case **is** to be tried by a jury.
3. Amended pleadings may not be filed and additional parties may not be joined after **February 14, 2020** except with leave of the Court.
4. Initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1) shall be completed no later than **April 1, 2023**.
5. All fact discovery shall be completed no later than **TBD**.
6. The plaintiff shall provide HIPAA-compliant medical release forms by **October 1, 2020**.
7. The parties are to conduct discovery in accordance with the Federal Rules of Civil Procedure and the Local Rules of the Southern District of New York. The following interim deadlines may be extended by the parties on consent without application to the Court, provided that the parties meet the deadline for completing fact

discovery set forth in ¶ 5 above.

- a. Initial requests for production of documents pursuant to Fed. R. Civ. P. 34 shall be served by **June 20, 2022**.
- b. Interrogatories shall be served by **June 20, 2022**.
- c. Document productions shall be completed no later than **October 1, 2023**.
- d. Depositions shall be completed by **TBD**.
- e. Requests to admit pursuant to Fed. R. Civ. P. 36 shall be served by **TBD**.
8. Expert Discovery
  - a. The parties do not expect that there will be expert testimony.
9. Motions for summary judgment, if any, shall be filed no later than **TBD**.

Responses, if any, shall be filed no later than **TBD**, with replies due **TBD**.

10. Counsel for the parties have conferred and their present best estimate of the length of trial is **5 days**.

This Order may not be modified or the dates herein extended, except by further Order of this Court for good cause shown. **Failure to comply with the deadlines set forth herein may result in sanctions, including preclusion at trial of information not provided or dismissal of claims or defenses.**

SO ORDERED.

Dated: \_\_\_\_\_  
New York, New York

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LORETTA A. PRESKA  
United States District Judge